

## **London Tenants Federation 2571 – M32 – Student accommodation**

*Would policy H17 provide a justified and effective approach to provision of purpose-built student housing (PBSA) in London? In particular:*

- a) Would the criteria set out in Policy H17 be justified and effective in delivering PBSA to meet identified need?*
- b) Would the approach to affordable student accommodation be justified and effective?*
- c) Would the approach to living spaces and layout provide good design in PBSA to meet the objectives of good growth policies GG1 to GG4?*
- d) Overall would policy H17 meet the objectives of Policy GG4 in delivering the homes Londoners need.*

Policy H17 A (1) suggesting that student housing contributes to mixed and balanced or inclusive communities is often stated in planning policy, but without substantial evidence that this is the case.

Far from supporting in developing mixed and balanced or inclusive communities, the studentification / large concentrations of student housing that has occurred in Islington, Camden, Southwark and Tower Hamlets and which is spreading to boroughs such as Kingston and Ealing has often had negative impact on existing residential communities – resulting in changes to shops and services delivered, particularly in less well-off communities as well as taking up land that is desperately needed for social rented homes.

We note that in both Islington and Camden, as well as high concentrations of PBSA, there has been an increase of students living on social housing estates occupying buy to let homes. The worst problems with this are students holding loud parties that disturb and distress their neighbours who may be older people or households with young children that need to get up for school in the morning – and / or using facilities such as multi-use games pitches meant for the children and young people of more income deprived households, or simply partying during the night-time in children's play areas. Be sure that social housing does not often have the best of sound insulation to mitigate this.

This, both PBSA, and growth of students living short term of social housing estates necessarily creates some anger particularly amongst those living in overcrowded homes / accommodating hidden homelessness.

Monitoring reports of the London Plan frequently highlight annual delivery of as much, if not more, student housing than desperately needed social rented housing in London.

As a relatively recent example of the detrimental impact of concentration of student and single person dwelling in the North Acton, part of the OPDC area, we have cut and pasted the following from the 'Grand Union Alliance's response to consultation on the OPDC's Local Plan submitted in September 2017.

*“To some, large areas of development of student accommodation and private housing such as that around North Acton is actually the creation of a transient community, consisting almost exclusively of one demographic – rather than a diverse lifetime neighbourhood.*

*There is concern that this area particularly provides over concentration of student and single person dwellings to the exclusion of other forms of housing for which there*

*is greater evidence of need. This also delivers types of supporting infrastructure, shops and services that don't meet wider needs.*

*The area already accommodates 718 student bed spaces at 'The Costume Store' Victoria Road (former BBC costume store) 657 student bed spaces at NEC House, 1 Victoria Road. The Holbrook House application (approved in May 2017) is for 424 student bed spaces and Lyra Court 184. This is a total 1,933 – meeting 60% of the need across the housing market area – (3200 identified in the SHMA) – of the three boroughs. This is an incredible contrast with the targets and intended delivery of London Affordable Rent or family sized homes.*

*Other developments and recently approved applications have a predominance of one-bedroom flats – adding further to the already the creation of an area that is neither mixed or balanced. The development on the junction of Victoria and Chase Road is 151 residential units 55% of which are one-bedroom flats and only 2% with family sized accommodation. 6 Portal Way with 578 residential units includes 340 one-bedroom flats (59%) and only 5% family sized homes. (Total 432 one-bedroom flats and just 35 (5%) family sized homes).*

*In consultation events on the regulation 18 Local Plan where residents expressed concerns about over concentration of student housing in North Acton officers said that they would ensure that communities are mixed and balanced and not dominated by one housing typology or tenure. Mention of discouraging student housing in North Acton was made. The current policy fails to protect against a mono-type of housing form developing in the area.*

*In this respect, what has already been delivered in North Acton should be deemed contrary to policy set out in H10a (iii) and (iv). Again, it's not clear how the OPDC will measure and monitor undermining of conventional self-contained housing supply and 'overconcentration' in any one specific location.*

*The OPDC is responsible for catering for the needs of students along with the authorities in the housing market area, not those of any one university. We note the officers report relating to the Holbrooke House application (determined in August 2017) not meeting objectively assessed need assessed in the SHMA, but meeting a need identified by Imperial College - "The proposed student accommodation meets a need identified by Imperial College and ensures all first-year students attending the university will be provided with a college managed space".*

*The policy should provide a map showing where there is existing student accommodation and where it may be appropriate to deliver any more (if meeting objectively assessed need) and where there is already overconcentration of student accommodation, where diversity of area threatened and it is therefore inappropriate to deliver any more. It should provide information of their co-operation with the boroughs in term of meeting objectively assessed need for student housing and what proportion of need the boroughs will provide, to prevent further overconcentration of student housing in the OPDC area and undermining of delivery of conventional self-contained housing supply.*

*Additionally, the policy should require that student housing developments deliver the associated social and community infrastructure needed in order not to put additional stress on existing services (including health services). It should ensure delivery of an appropriate quota of publicly accessible green and open spaces*

Policy H17 B provides for students (many from wealthy households, internationally) to benefit from access to locations well connected local services by walking cycling and public transport. Many communities would feel that this is incredibly one-sided benefit as the consultation response to the draft OPDC Local Plan from the Grand Union Alliance, above, suggests.

**We propose that**

- **policy and / or supporting text needs to highlight that student housing does not always provide benefit to local communities and indeed at times creates detriment and tensions;**
- **the Mayor commission a study to assess the impact of high levels of concentration of student housing on existing communities, including detailed interviews with local residents and that this study be mentioned in supporting text of Policy H17;**
- **any PBSA should provide 50% social rented home;**
- **policy H17 A should include add an additional point discouraging over concentration of student housing in particular boroughs / part of boroughs where universities are based – with some definition of what might constitute over concentration of student housing might be.**